

**UNITED STATES DISTRICT COURT
DISTRICT OF UTAH**

<p>KRISTEN PILKINGTON, individually and on behalf of all others similarly situated,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>GORSUCH, LTD.</p> <p style="text-align: center;">Defendant.</p>	<p>DECLARATION OF FRANK S. HEDIN IN SUPPORT OF PLAINTIFF’S MOTION FOR ADMISSION PRO HAC VICE OF FRANK S. HEDIN</p> <p>Case No. 2:24-cv-00434-RJS</p> <p>District Judge Robert J. Shelby Magistrate Judge Dustin B. Pead</p>
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I, Frank S. Hedin, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746 and based on my own personal knowledge, that the following statements are true:

1. I am the founding partner at the law firm Hedin LLP and a member in good standing of the Florida Bar and the State Bar of California, and I submit this declaration in support of Proposed Intervenor’s Time-Sensitive Motion to Intervene and to Dismiss or, in the Alternative, to Transfer or Stay this Action Pursuant to the First-To-File Rule and Incorporated Memorandum of Law.

2. From 2012 to 2013, I served as law clerk to the Honorable William Q. Hayes, U.S. District Judge for the Southern District of California. I then worked for four years at a law firm in Miami, Florida, where I represented plaintiffs and defendants in general commercial litigation and intellectual property matters.

3. I co-founded Hedin LLP, previously known as Hedin Hall LLP, in 2018.

4. My firm represents Plaintiff Kristen Pilkington in the above-captioned action styled *Pilkington v. Gorsuch, Ltd.*, Case No. 2:24-cv-00434 (D. Utah) (the “Action”).

5. My firm specializes in class action litigation, including consumer class actions and data privacy class actions.

6. My firm has initiated and litigated several cases under the Utah Notice of Intent to Sell Nonpublic Personal Information Act, Utah Code Ann. § 13-37 (the “NISNPIA”). These cases include: *Anderson v. The Economist Newspaper NA Inc.*, Case No. 2:23-cv-00878 (D. Utah); *James Camoras v. Publishers Clearing House, LLC*, Case No. 4:23-cv-00118 (D. Utah); *Curry v. Mrs. Fields Gifts*, Case No 2:22-cv-00651 (D. Utah); *Langston v. DotDash Media, Inc.*, Case No. 1:24-cv-00046 (D. Utah); *Arnstein v. Sundance Holdings Group, LLC*, Case No. 2:24-cv-00344 (D. Utah). Each of these cases, like the Action, concerns claims brought under the NISNPIA alleging illegal sales of personally identifying information.

7. My firm has partnered with David Scofield of Peters Scofield, P.C., as local counsel in each of these actions.

8. To my knowledge, no other firm is currently litigating claims under the NISNPIA.

9. I do not intend to practice law generally in Utah, nor maintain an office in the state.

I declare under penalty of perjury pursuant to the laws of the United States of America that the foregoing is true and correct.

Executed April 1, 2025 in Miami, Florida.

s/ Frank S. Hedin
Frank S. Hedin
(signed by filing attorney with
permission of Mr. Hedin)